

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Ibrahim Al Amreeki,

Defendant.

21CR418

Judge Gettleman

**Defendant's Unopposed Motion to Extend the Time to Submit the Defendant's Version of
Offense to the Probation Department**

Now comes the Defendant, Ibrahim Al Amreeki, by and through his attorney Dena M. Singer of Bedi & Singer, LLP and moves for an order respectfully requests this Court to extend the time for the defendant to submit The Defendant's version of the offense to the probation department. In support, defendant states the following:

1. Defendant is charged with knowingly making a threatening communication transmitted in interstate commerce, in violation of Title 18 United States Code, Section 875(c).
2. On April 6, 2022 the defendant entered a plea of guilty to count one of the superseding indictment. (Dkt. 39).
3. After the Court accepted the plea the Court referred the case to probation with position papers being due on June 24, 2022 Dkt. 39).
4. Per local rule 32.1, "Not more than 14 days after the determination of guilt, the attorney for the government shall submit to the probation officer its version of the offense conduct. Not more than 7 days after submission of the government's version of the offense conduct, the attorney for each defendant shall submit a version of the offense conduct to the probation officer."
5. The government submitted its version of offense on or about April 26, 2022.

6. The defendant is requesting an extension of three weeks to submit his version of offense.
The reason for this request is that undersigned counsel needs more time to go through the government's version of events with Mr. Al Amreeki. The government's version of offense was extensive and contained discovery that had not been previously tendered.
Therefore, undersigned counsel need's additional time to review this with the defendant.
7. This request will not affect any of the other dates the court ordered in Dkt. 39.
8. The government does not have an objection to this request.

Wherefore, the Defendant respectfully requests that this motion be granted and enter an order continuing the time to submit the defendant's version of offense until May 17, 2022.

Respectfully submitted,

/s/ Dena M. Singer
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CERTIFICATE OF SERVICE

I, Dena Singer, Attorney at Law, hereby certifies that the foregoing Motion was served in accordance with Fed.R.Crim.P.49, Fed.R.Civ.P.5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

/s/Dena M. Singer
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